#### **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Christa C. Turner

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION.

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

STORY FAMILY TRUST #3, THEODORE STORY, individually and as trustee of the STORY FAMILY TRUST #3, CYNTHIA STORY, individually and as trustee of the STORY FAMILY TRUST #3, WARREN B. KAHN as trustee of the STORY FAMILY TRUST #3, and SAMANTHA STORY, individually,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05159 (SMB)

## THIRD AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (BRL), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures were exchanged on: April 14, 2014.
- 2. Fact Discovery shall be completed by: July 31, 2015.
- 3. The Disclosure of Case-in-Chief Experts shall be due: October 30, 2015.
- 4. The Disclosure of Rebuttal Experts shall be due: November 6, 2015.
- 5. The Deadline for Completion of Expert Discovery shall be: May 5, 2016.
- 6. The Deadline to file a Notice of Mediation Referral shall be: July 5, 2016.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: July 19, 2016.
- 8. The Deadline for Conclusion of Mediation shall be: November 16, 2016.

Dated: June 22, 2015

### **BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona\_

45 Rockefeller Plaza New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Christa C. Turner

Email: cturner@bakerlaw.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

## FREJKA, PLLC

By: /s/ Elise S. Frejka

733 Third Avenue - 15th Floor

New York, NY 10017 Telephone: 212.641-0800

Elise S. Frejka

Email: Efrejka@frejka.com

Jason S. Rappaport

Email: <u>Jrappaport@frejka.com</u>

Attorney for Defendants